

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI,
INC., OPENAI LP, OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, and OPENAI
HOLDINGS, LLC,

Defendants.

Civil Action No. 1:23-cv-11195 (SHS) (OTW)

PLAINTIFF THE NEW YORK TIMES COMPANY'S MOTION TO SEAL

Under paragraph 22 of the Stipulated Protective Order in this case (Dkt. 127), Plaintiff The New York Times Company (“The Times”) respectfully seeks to provisionally file under seal portions of its letter motion to compel. The letter motion seeks a conference to discuss a discovery dispute—specifically, The Times’s request that OpenAI produce documents in response to certain Requests for Production. The Times seeks to file portions of this letter motion under seal because certain exhibits to the motion contain or discuss documents that OpenAI or Microsoft designated as Protected Discovery Material under the Protective Order. Dkt. 127 ¶ 22. The Times does not affirmatively seek to seal any material. Under the Protective Order, Defendants have five business days to file a statement of reasons for why the material should be sealed. *Id.* The Times will review Defendants’ filings, and if necessary, confer about any disagreement.

Dated: November 18, 2024

/s/ Ian Crosby

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